

PSJ3

Exhibit 581



Suspicious Order Monitoring (SOM) Program: CVS Chain Review

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[DateTime]

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Agenda

- **Program Overview**
 - Suspicious Order Monitoring (SOM) program
 - Know Your Customer (KYC)
 - Electronic monitoring
- **CVS SOM Summary**
 - Review threshold event (held order) process
 - Discuss the value of active communication
- **Analytics - Macro Observations**
 - Analysis of controlled substance distribution
 - Key insights and trends
- **Store Specific Discussion**

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SOM Program Overview

Know Your Customer – Collection of customer specific information that allows for an appropriate assessment and validation, as well as accurate peer comparison.

Electronic Monitoring -- Systemic process prior to order fulfillment to ensure ordered quantity is not unusual.

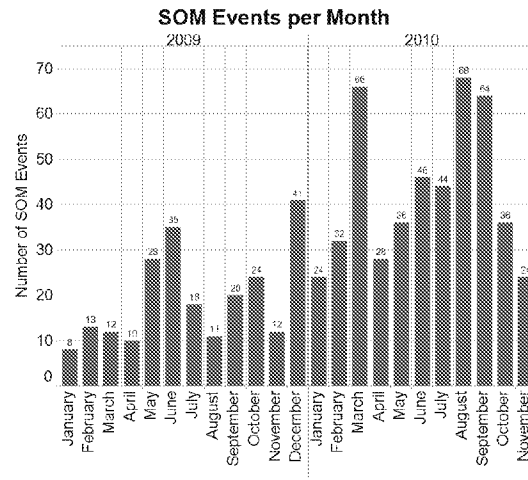
- Accrues allocated quantities for each DEA registrant – by drug family (grouping of equivalent products)
 - Imbedded in order system
 - Accrues dosage unit quantities
 - Operates on a calendar month
 - accrual reset to zero on first day of new month
- Threshold (quantity) limits exist for each DEA registrant, drug family combination
 - Created at a segment level and then customized for individual customers
- Orders are held (“threshold event”) when a customer’s allocated accrual exceeds the threshold limit
 - Business process is initiated for each threshold event
- At the conclusion of the business process, the held order can be released, cut, or cut and reported to the DEA and state agency(s) as suspicious
 - Threshold limit may also be increased or decreased

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SOM Program – CVS Stores

- CVS stores created 468 SOM events in 2010 – see *graph*
- 65% of SOM events were within the following three drug families:
 - Amphetamine
 - Lisdexamfetamine
 - Oxycodone
- 90% of SOM events were resolved with the order being released
- 6% of SOM events were confirmed order entry errors
 - Time/cost savings

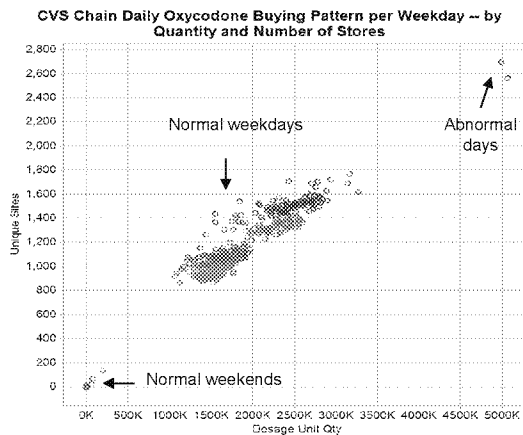
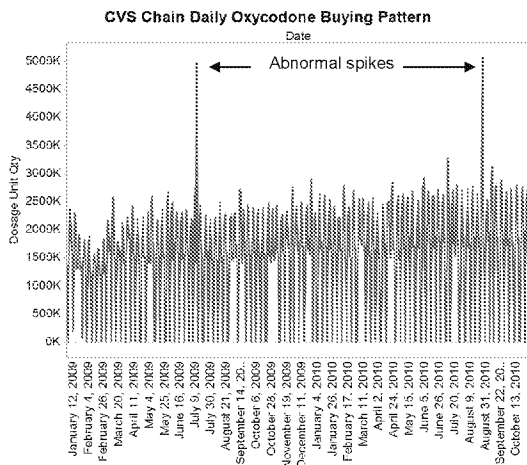


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Buying Patterns – Active Communication

Variations in a buying patterns, that are not known in advance, create SOM events. With active communication, these variations can be accounted for and SOM events prevented.



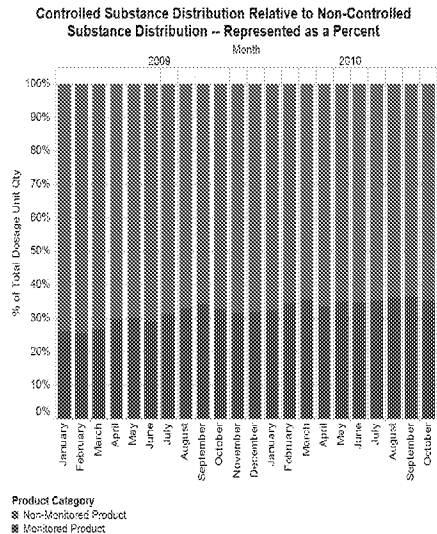
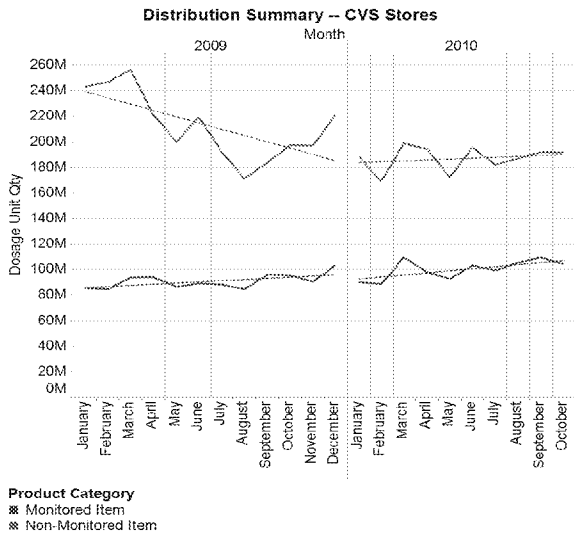
Weekday
* Sunday
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Pharmaceutical Distribution Summary

Consistent, and proportionate, growth of controlled substances is evident in 2010 on a macro level across CVS Chain stores.



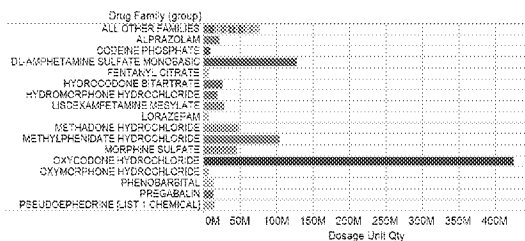
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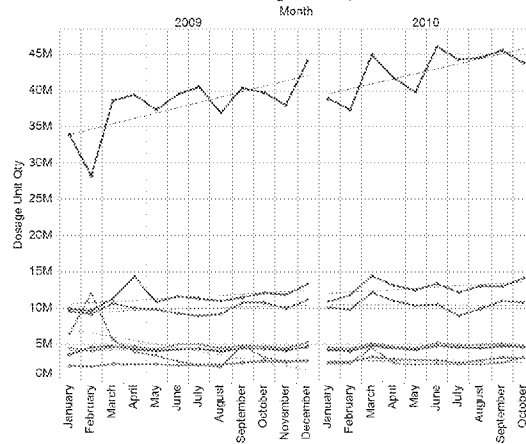
Controlled Substance Distribution

- Controlled substance purchases are concentrated primarily in Schedule II products.
- Oxycodone products account for 14% of all transactions and 42% of all controlled substance transactions.
- Oxycodone distribution has increased by 14% during the first 10 months of 2010 when compared to the first 10 months of 2009.

Controlled Substance Distribution in 2010 by Drug Family



Controlled Substance Distribution per Month and Drug Family (high volume drug families)



Drug Family

- DL-AMPHETAMINE SULFATE MONOBASIC
- HYDROCODONE BITARTRATE
- LISDEXAMFETAMINE MESYLATE
- METHADONE HYDROCHLORIDE
- METHYLPHENIDATE HYDROCHLORIDE
- MORPHINE SULFATE
- OXYCODONE HYDROCHLORIDE

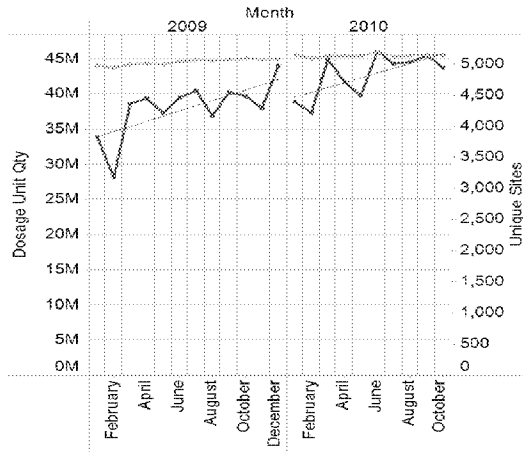
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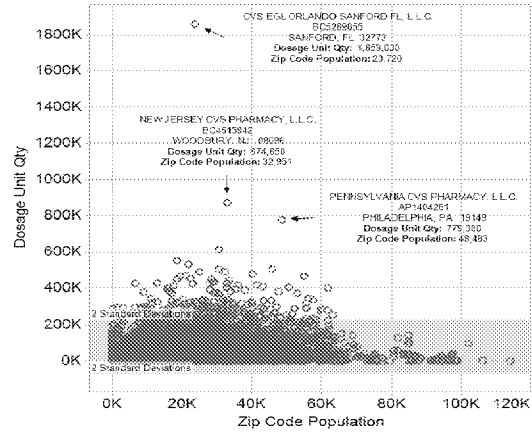
Oxycodone Drug Family – Micro Analysis

Oxycodone purchases have increased in 2010 by 14% while the number of CVS stores purchasing Oxycodone has increased by 2%. Several CVS stores buy quantities of Oxycodone products that vary from other CVS stores in a statistically significant way.

Oxycodone Distribution per Month Relative to Stores



Oxycodone Distribution in 2010 by Dosage Unit Quantity Relative to Zip Code Population

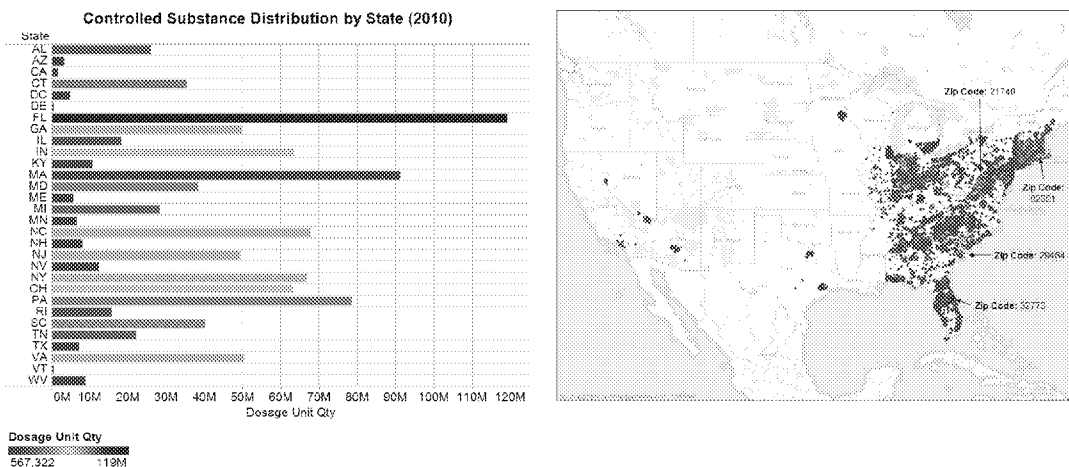


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Controlled Substance Distribution by State

Controlled substance distribution varies by region and there are areas of significant variation that warrants additional scrutiny, especially if they are located in areas where intelligence indicates that DEA and states are aggressive.



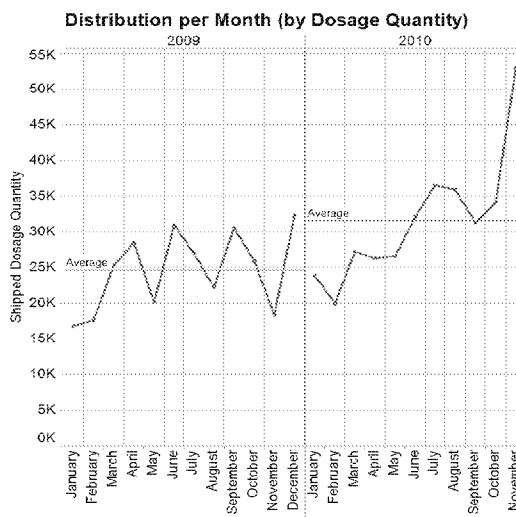
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CVS Pharmacy # 1136

CVS Pharmacy #1136 (DEA # BC5274636), located in Homestead, Florida has exhibited an abnormal buying pattern, specifically with their purchases of Oxycodone products.

- **High quantity when compared to other CVS stores**
 - November 2010 quantity is 537% above CVS store monthly average of 8,300
- **Rapid rate of growth**
 - 57% increase in the quantity purchased in November 2010 compared to previous three months
- **Changing and unbalanced product mix**
 - 65% of purchases in November 2010 are for controlled substances – compared to 41% in November 2009



Dea Base Description
 ✖ OXYCODONE HYDROCHLORIDE

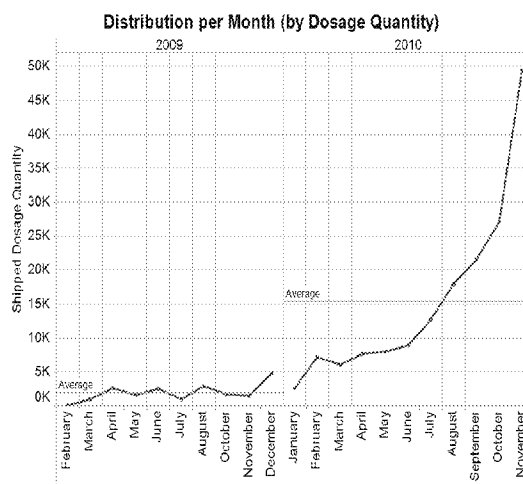
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CVS Pharmacy # 0174

CVS Pharmacy #0174 (DEA # BC5289926), located in Daytona, Beach has exhibited an abnormal buying pattern, specifically with their purchases of Hydrocodone products.

- **High quantity when compared to other CVS stores**
 - November 2010 quantity is 6,977% above CVS store monthly average of 700
- **Rapid rate of growth**
 - 147% increase in the quantity purchased in recent three months compared to the preceding three months
- **Unbalanced product mix**
 - 60%+ of purchases are for controlled substances
 - CVS stores infrequently purchases Hydrocodone products



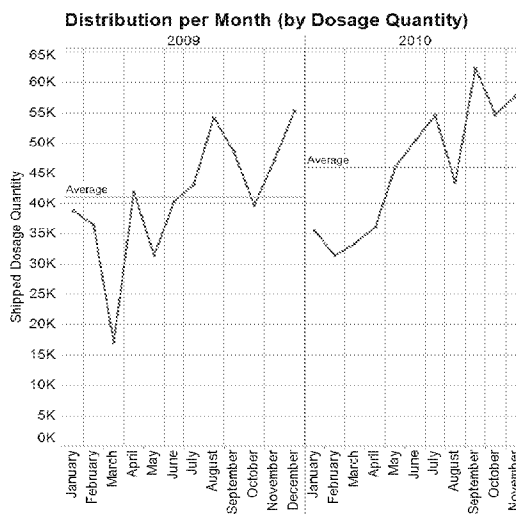
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CVS Pharmacy # 2848

CVS Pharmacy #2848 (DEA # BF7368308), located in Pompano Beach, Florida has exhibited an abnormal buying pattern, specifically with their purchases of Oxycodone products.

- **High quantity when compared to other CVS stores**
 - 2010 monthly average is 453% above CVS store monthly average of 8,300
- **Unbalanced product mix**
 - 70%+ of purchases are for controlled substance products
 - Oxycodone products account for 55% of all purchases



Dea Base Description
 ✖ OXYCODONE HYDROCHLORIDE

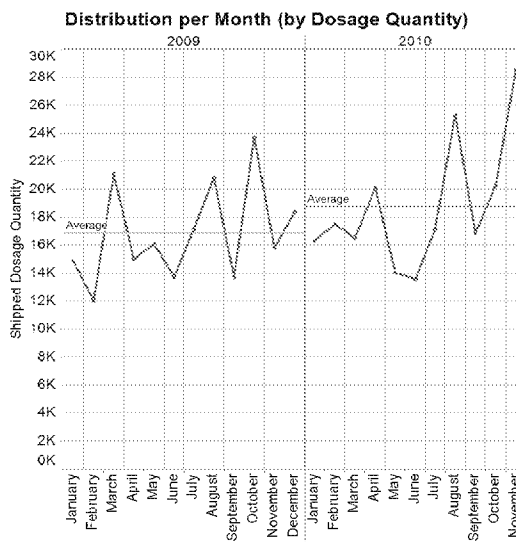
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CVS Pharmacy # 3639

CVS Pharmacy #3639 (DEA # BC5277808), located in Bushnell, Florida has exhibited an abnormal buying pattern, specifically with their purchases of Oxycodone products.

- **High quantity when compared to other CVS stores**
 - November 2010 quantity is 244% above CVS store monthly average of 8,300
- **Unbalanced product mix**
 - 56% of purchases are for controlled substances
 - 25% of purchases are for Oxycodone products



Dea Base Description
 ⌘ OXYCODONE HYDROCHLORIDE

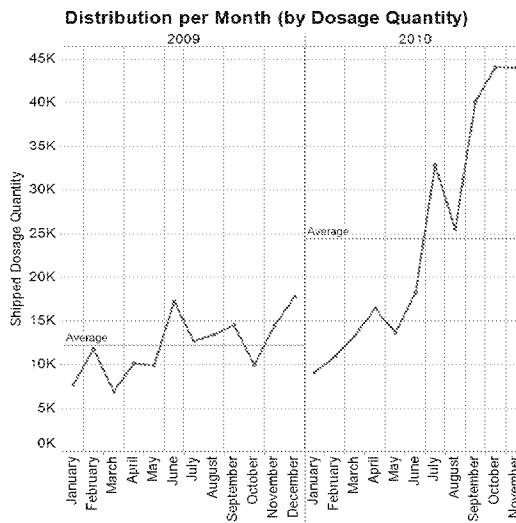
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CVS Pharmacy # 2732

CVS Pharmacy #2732 (DEA # BJ7499456), located in Hollywood, Florida has exhibited an abnormal buying pattern, specifically with their purchases of Oxycodone products.

- **High quantity when compared to other CVS stores**
 - November 2010 quantity is 429% above CVS store monthly average of 8,300
- **Unbalanced product mix**
 - 50%+ of purchases are for controlled substances
 - 32% of purchases are for Oxycodone products



Dea Base Description
 ✖ OXYCODONE HYDROCHLORIDE

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Next Steps...

